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8 **UNITED STATES BANKRUPTCY COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA, LOS ANGELES DIVISION**
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11 In re
12 GIRARDI KEESE,
13 Debtor.
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Case No. 2:20-bk-21022-BR

Chapter 7

**STIPULATION AND [PROPOSED]
ORDER TO CONTINUE RULE 2004
DEPOSITION OF MICHAEL J. ULLMAN
OF ULLMAN ACCOUNTANCY CORP.**

Continued Date

Date: August 25, 2021

Time: 1:00 p.m.

Place: Remote via Zoom Conference

Judge: Hon. Barry Russell

1 Elissa D. Miller, Chapter 7 trustee (“Trustee”) on the one hand, and Michael J. Ullman
2 (“Mr. Ullman”) of Ullman Accountancy Corp. (collectively, “Ullman”, together with Trustee the
3 “parties”) on the other hand, by and through their respective attorneys, and subject to the approval
4 of this Court, enter into this Stipulation and [Proposed] Order to Continue Rule 2004 Deposition
5 of Michael J. Ullman of Ullman Accountancy Corp. (the “Stipulation”), the purpose of which is to
6 continue the Trustee’s Rule 2004 deposition of Mr. Ullman to 1:00 p.m. on August 25, 2021, to be
7 conducted remotely via Zoom Conference.

8 This Stipulation is based on the following facts:

9 A. On June 28, 2021, the Court entered its *Order Granting Motion for Order*
10 *Requiring Examination and Production of Documents by Ullman Accountancy Corp. and Michael*
11 *J. Ullman Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure* (Dkt. 440)
12 (“Order”). The Order called for the deposition of Mr. Ullman on July 23, 2021 at 1:00 p.m.

13 B. On June 29, 2021, counsel for the Trustee sent to Ullman via email a *Subpoena to*
14 *Testify at a Deposition in a Bankruptcy Case (or Adversary Proceeding)* (“Subpoena”), of which
15 Ullman accepted service that same day.

16 E. On July 22, 2021, the parties filed a Stipulation seeking to continue the deposition
17 of Ullman from July 23, 2021 to July 30, 2021. On July 26, 2021, this Court entered an *Order to*
18 *Continue Rule 2004 Deposition of Michael J. Ullman of Ullman Accountancy Corp.* (Dkt. 518)
19 continuing the deposition of Mr. Ullman from July 23, 2021 at 1:00 pm, to July 30, 2021 at 1:00
20 p.m.

21 F. Prior to July 30, 2021, the parties agreed to continue the deposition of Mr. Ullman
22 to a mutually agreeable future date after July 30, 2021. The parties have since agreed to continue
23 the deposition to August 25, 2021 at 1:00 p.m., subject to a potential minor modification of the
24 date. The parties will submit a new stipulation if a minor modification occurs.

25 **STIPULATION**

26 Based on the foregoing, and subject to approval of this Court, the parties stipulate and
27 agree to continue the Rule 2004 deposition of Mr. Ullman to 1:00 p.m. on August 25, 2021, to be
28 conducted remotely via Zoom Conference, subject to the right of the parties to agree mutually to a

1 minor modification of the date.

2 DATED: August 12, 2021

LAW OFFICES OF RONALD RICHARDS &
ASSOCIATES, A.P.C.

3
4 By: Ronald Richards

5 Ronald Richards
6 Special Litigation Counsel for
7 Elissa D. Miller, Chapter 7 Trustee

8 DATED: August 12, 2021

GREENBERG GROSS LLP

9
10 By: Evan C. Borges

11 Evan C. Borges
12 Attorneys for Third Parties
13 Michael J. Ullman and Ullman Accountancy Corp.

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15 **ORDER**

16 Based on the foregoing Stipulation, the Rule 2004 deposition of Mr. Ullman is continued
17 to 1:00 p.m. on August 25, 2021, to be conducted remotely via Zoom Conference, subject to the
18 right of the parties to agree mutually to a minor modification of the date.

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20 DATED: August ___, 2021

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22 BARRY RUSSELL
23 United States Bankruptcy Court Judge